

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Phill's Custom Cabinets, Inc.
Mailing Address: 2400 KY 81, Owensboro, KY 42301

Source Name: Phill's Custom Cabinets, Inc.
Mailing Address: 2400 KY 81
Owensboro, KY 42301

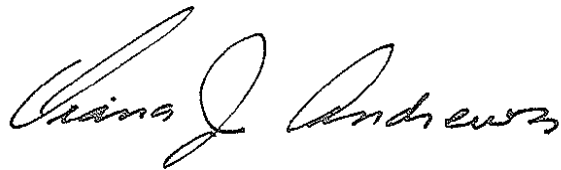
Source Location: Near the intersection of State Route 81 and
Haycraft Rd

Permit: S-07-102
Agency Interest: 77304
Activity: APE20070001
Review Type: Minor Source, Operating
Source ID: 21-059-00210

Regional Office: Owensboro Regional Office
3032 Alvey Park Dr. W., Suite 700
Owensboro, KY 42303
(270) 687-7304

County: Daviess

Application
Complete Date: July 9, 2007
Issuance Date: July 28, 2007
Revision Date:
Expiration Date: July 28, 2017



**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01 (01)

Description: Two (2) production paint booths for spray coating of custom cabinetry. Both booths use High Volume Low Pressure (HVLP) spray guns and cup guns. Cup guns are used for applying glaze only. Together, both booths are limited to 14 wood pieces per hour with a spray time of 30 seconds per piece. The potential annual spray time for both booths is 1,022 hours. The application rate of the HVLP guns is rated at 4.6875 gallons per hour. Both booths are limited to 14,300 pieces per year if the facility were to operate 8,760 hours per year. Coatings applied in the booths include primer, sealer, varnish, lacquer, stain and glaze. Other materials used include catalyst and reducer. The exhaust from each booth is vented to the atmosphere through an individual stack. Particulate emissions are controlled with panel filters. The booths were constructed in 1996.

APPLICABLE REGULATIONS:

401 KAR 59:010 – New process operations. Applicable with respect to particulate emissions to each affected facility commenced on or after July 2, 1975.

1. Operating Limitations:

- A. The maximum annual usage of coatings, catalysts and reducers shall not exceed 4,791 gallons.
- B. Particulate filters shall be in place and operating efficiently at all times coatings are being applied.

Compliance Demonstration Method: Refer to Monitoring and Record Keeping Requirements.

2. Emission Limitations:

- A. 401 KAR 59:010 § 3(1) Opacity Standard: The opacity of continuous emissions from a control device or stack shall be less than twenty (20) percent opacity.
- B. 401 KAR 59:010 § 3(2) Mass Standard: Particulate matter emissions from a control device or stack shall not exceed 2.34 pounds per hour.

Compliance Demonstration Method for Emission Limitation A:

Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at each stack no less than weekly and maintaining a log of the observations. If visible emissions from the stacks are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

Compliance Demonstration Method for Emission Limitation B:

Compliance with the mass standard will be assumed when the booths are operated in accordance with Operating Limitation B

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 section 2(2) and 50:045 section 4.

4. Monitoring Requirements:

- A. The permittee shall monitor the gallons of coatings, catalysts and reducers used monthly.
- B. The permittee shall monitor visible emissions from the paint booth stacks weekly as specified in **Compliance Demonstration Method A** above.

5. Recordkeeping Requirements:

- A. The permittee shall maintain records of the gallons of coatings, catalysts and reducers used monthly and annually.
- B. The permittee shall maintain records of qualitative visible emission observations, including the time and date of the observation.
- C. The permittee shall maintain records of corrective actions taken as a result of seeing visible emissions.
- D. The permittee shall maintain records of Method 9 readings.
- E. The permittee shall maintain records of the replacement of filters, including the date and time of the replacement.

6. Reporting Requirements:

It is specified here that the semiannual compliance report required by SECTION C (3) (c) of this permit need only require monthly records of the usage of coatings, catalysts and reducers during the compliance period and a summary of qualitative visual emission observations during the compliance period.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit 02 (03)**

Description: Automatic spray machine with a four (4) nozzle head for surface coating of custom cabinetry. The application rate of coating is 1.33 gallons per hour. The automatic machine is capable of producing 65,700 pieces per year with an application rate of approximately 0.066 gallons per piece. Emissions exhaust through a single stack to the atmosphere. Particulate emissions are controlled by paper filters and filter pads. The automatic spray machine was constructed in 2007.

APPLICABLE REGULATIONS:

401 KAR 59:010 – New process operations. Applicable with respect to particulate emissions to each affected facility commenced on or after July 2, 1975.

1. Operating Limitations:

- A. The maximum annual usage of coatings, catalysts and reducers shall not exceed 4,380 gallons.
- B. Particulate filters shall be in place and operating efficiently at all times coatings are being applied.

Compliance Demonstration Method: Refer to Monitoring and Record Keeping Requirements.

2. Emission Limitations:

- A. 401 KAR 59:010 § 3(1) Opacity Standard: The opacity of continuous emissions from a control device or stack shall be less than twenty (20) percent opacity.
- B. 401 KAR 59:010 § 3(2) Mass Standard: Particulate matter emissions from a control device or stack shall not exceed 2.34 pounds per hour.

Compliance Demonstration Method for Emission Limitation A:

Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at the stack no less than weekly and maintaining a log of the observations. If visible emissions from the stack are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

Compliance Demonstration Method for Emission Limitation B:

Compliance with the mass standard will be assumed when the booth is operated in accordance with Operating Limitation B

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 section 2(2) and 50:045 section 4.

4. Monitoring Requirements:

- A. The permittee shall monitor the gallons of coatings, catalysts and reducers used monthly.
- B. The permittee shall monitor visible emissions from the paint booth stacks weekly as specified in **Compliance Demonstration Method A** above.

5. Recordkeeping Requirements:

- A. The permittee shall maintain records of the gallons of coatings, catalysts and reducers used monthly and annually.
- B. The permittee shall maintain records of qualitative visible emission observations, including the time and date of the observation.
- C. The permittee shall maintain records of corrective actions taken as a result of seeing visible emissions.
- D. The permittee shall maintain records of Method 9 readings.
- E. The permittee shall maintain records of the replacement of filters, including the date and time of the replacement.

6. Reporting Requirements:

It is specified here that the semiannual compliance report required by SECTION C (3) (c) of this permit need only require monthly records of the usage of coatings, catalysts and reducers during the compliance period and a summary of qualitative visual emission observations during the compliance period.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Unit 03 (04)**

Description: Heatmor stoker wood fired indirect heat exchanger rated at 400,000 BTU per hour. The maximum fuel usage rate is 60 pounds of wood per hour. Date Installed: October 1, 2006.

APPLICABLE REGULATIONS:

401 KAR 59:010 – New process operations. Applicable with respect to particulate emissions to each affected facility commenced on or after July 2, 1975.

1. Operating Limitations:

- A. Only dry untreated, uncoated wood shall be burned in the unit.

Compliance Demonstration Method:

The permittee shall clearly post a sign in the area of the unit which relays the message that the burning of coated or treated wood in the unit is strictly prohibited.

- B. The unit shall not operate during the months of May, June, July, August and September.

Compliance Demonstration Method:

The permittee shall maintain a monthly log of the operation of the unit. During months the unit did not operate, “did not operate” shall be entered in the monthly log.

2. Emission Limitations:

- A. 401 KAR 59:010 § 3(1) Opacity Standard: The opacity of continuous emissions from a control device or stack shall be less than twenty (20) percent opacity.

- B. 401 KAR 59:010 § 3(2) Mass Standard: Particulate matter emissions from a control device or stack shall not exceed 2.34 pounds per hour.

Compliance Demonstration Method for Emission Limitation A:

Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at the stack no less than weekly and maintaining a log of the observations. For periods of time the unit does not operate, “did not operate” shall be entered in the log no less than monthly. If visible emissions from the stack are seen (not including condensed water in the plume), then an inspection of the unit shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the unit shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the unit during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the unit may continue to operate.

Compliance Demonstration Method for Emission Limitation B:

Compliance with the mass standard is assumed unless testing is required.

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 section 2(2) and 50:045 section 4.

4. Monitoring Requirements:

- A. The permittee shall monitor the pounds of wood that is burned in the unit monthly.
B. The permittee shall monitor the operation of the unit monthly.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Recordkeeping Requirements:

- A. The permittee shall maintain records of the pounds of wood burned monthly and annually.
- B. The permittee shall maintain records of qualitative visible emission observations, including the time and date of the observation.
- C. The permittee shall maintain records of corrective actions taken as a result of seeing visible emissions.
- D. The permittee shall maintain records of Method 9 readings.
- E. The permittee shall maintain monthly records of the operation of the unit.

6. Reporting Requirements:

It is specified here that the semiannual compliance report required by SECTION C (3) (c) of this permit need only require monthly records of the pounds of wood burned during the compliance period and a summary of qualitative visual emission observations during the compliance period.

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

SECTION C - GENERAL CONDITIONS (CONTINUED)

The summary reports are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C - GENERAL CONDITIONS (CONTINUED)**6. Compliance**

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - (1) Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - (2) All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device. Daily observations are required during daylight hours of all operations, control equipment and any visible emissions to determine whether conditions appear to be either normal or abnormal. If the operations, controls and/or emissions appear to be abnormal, the permittee must then comply with the requirements of Section C – General Conditions, 3.a.(2), of this permit.
 - (3) A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - (1) Identification of the term or condition;
 - (2) Compliance status of each term or condition of the permit;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
 - (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

- (6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality	Division for Air Quality
Owensboro Regional Office	Central Files
3032 Alvey Park Dr. W. STE 700	803 Schenkel Lane
Owensboro, KY 42303-2191	Frankfort, KY 40601-1403

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. One (1) Computer Controlled Saw	401 KAR 59:010
2. Two (2) Table Saws	401 KAR 59:010